

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

FUSION ELITE ALL STARS and SPIRIT
FACTOR LLC D/B/A FUEL ATHLETICS,
Individually and on Behalf of All Others
Similarly Situated

Plaintiffs,

v.

Varsity Brands, LLC; Varsity
Spirit, LLC; Varsity Spirit Fashion
& Supplies, LLC; and U.S. All Star
Federation, Inc.,

Defendants.

Civ. Action No. 2:20-cv-03390

STARS AND STRIPES GYMNASTICS
ACADEMY INC. D/B/A STARS AND
STRIPES KIDS ACTIVITY CENTER,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

Varsity Brands, LLC; Varsity
Spirit, LLC; Varsity Spirit Fashion
& Supplies, LLC; and U.S. All Star
Federation, Inc.,

Defendants.

Civ. Action No. 2:20-cv-03277

**JOINT MOTION TO TRANSFER CASES TO THE WESTERN DISTRICT OF
TENNESSEE**

Defendants Varsity Brands, LLC, Varsity Spirit, LLC, Varsity Spirit Fashion & Supplies, LLC, and U.S. All Star Federation, Inc., hereby jointly move this Honorable Court for an order, pursuant to 28 U.S.C. § 1404(a), transferring this action from this district to the United States District Court for the Western District of Tennessee. The grounds of this motion are fully set forth in the supporting memorandum of law, along with the Declarations of John Newby, Steven J. Kaiser, and Steve Peterson submitted concurrently herewith.

Dated: July 31, 2020

/s/ Barbara O'Connell

Barbara O'Connell (Pa. Bar #46461)
SWEENEY AND SHEEHAN, PC
1515 Market Street
Suite 1900
Philadelphia, PA 19102
Phone: (215) 563-9811
Fax: (215) 557-0999
Barbara.Oconnell@SweeneyFirm.com

Grady Garrison (*pro hac vice* motion forthcoming)
Nicole D. Berkowitz (*pro hac vice* motion forthcoming)
BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ
165 Madison Avenue, Suite 2000
Memphis, TN 38103
Phone: (901) 526-2000
Fax: (901) 577-0866
ggarrison@bakerdonelson.com
nberkowitz@bakerdonelson.com

Attorneys for U.S. All Star Federation, Inc.

/s/ Antonio M. Pozos

Antonio M. Pozos (Pa. Bar #323968)
FAEGRE DRINKER BIDDLE & REATH LLP
One Logan Square, Suite 2000
Philadelphia, PA 19103
Phone: (215) 988-2700
Fax: (215) 988-2757
antonio.pozos@faegredrinker.com

George S. Cary (*pro hac vice* motion forthcoming)
Mark W. Nelson (*pro hac vice* motion forthcoming)
Alexis Collins (*pro hac vice* motion forthcoming)
Steven J. Kaiser (*pro hac vice* motion forthcoming)
CLEARY GOTTlieb STEEN & HAMILTON LLP
2112 Pennsylvania Avenue, NW
Washington, DC 20037
Phone: (202) 974-1500
Fax: (202) 974-1999
gcary@cgsh.com
mnelson@cgsh.com
alcollins@cgsh.com
skaiser@cgsh.com

Attorneys for Varsity Brands, LLC; Varsity Spirit, LLC; Varsity Spirit Fashion & Supplies, LLC